

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL P. & SHELLIE GILMOR, et al.,)
)
Plaintiffs,) Case No. 4:10-cv-0189-ODS
)
v.)
)
PREFERRED CREDIT CORPORATION,)
et al.,)
)
Defendants.)

**DEFENDANT SOVEREIGN BANK'S UNOPPOSED MOTION FOR LEAVE TO FILE
REPLY SUGGESTIONS WITH EXCESS PAGES**

Pursuant to W.D. Mo. L.R. 7.1(f), Defendant Sovereign Bank (“Sovereign”), by and through its undersigned attorneys, respectfully moves this Court for leave to file reply suggestions in support of the Non-Holder Defendants’ Motion to Dismiss for Lack of Standing containing fifteen (15) additional pages in excess of the ten (10) page limit for reply suggestions.

In support of this Motion, Sovereign states as follows:

1. In response to the Non-Holder Defendants’ Motion to Dismiss for Lack of Standing, Plaintiffs have submitted sixty-eight (68) pages of Suggestions in Opposition to the Motion (the “Opposition Suggestions”) and twenty-four (24) exhibits, totaling over 700 pages.

See Doc. No. 98. Many of these exhibits are well beyond the scope of the Complaint.

2. In order to properly present the facts and arguments necessary to address the substantial volume of materials included with Plaintiffs’ Opposition Suggestions and the matters at issue, Sovereign requests leave to file reply suggestions containing fifteen (15) pages in excess of the Court’s ten (10) page limit, with a total of no more than twenty-five (25) pages.

3. This Court granted a request by Plaintiffs to extend the page limit for their Opposition Suggestions by fifty-five (55) pages. *See Doc. No. 88.*

4. Plaintiffs do not oppose the relief requested herein.

5. Sovereign is an undisputed Non-Holder Defendant as Plaintiffs make no allegation or assertion that it ever held, purchased, or serviced any interest in the Preferred Credit Corporation loans made to the Named Plaintiffs. Sovereign expects that certain other undisputed Non-Holder Defendants may join in Sovereign's reply suggestions. At this time, it is uncertain which additional undisputed Non-Holder Defendants will join in these reply suggestions.

6. Neither this Motion, nor the anticipated reply suggestions, are filed for purposes of oppression, harassment, or delay.

WHEREFORE, Sovereign respectfully requests that this Court grant this unopposed Motion and enter an order granting Sovereign leave to file reply suggestions containing fifteen (15) pages in excess of the Court's ten (10) page limit, with a total of no more than twenty-five (25) pages.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was filed electronically with the Clerk of the United States District Court for the Western District of Missouri, Western Division, this 16th day of December, 2010, with notice of case activity to be generated and sent electronically to all designated persons.

/s/Randolph G. Willis
An Attorney for Sovereign Bank